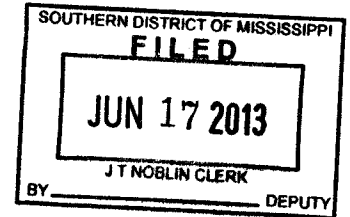


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV251 LG JMR

AARON F. BROUSSARD, DANIEL ABEL,
CHARLES LEARY, VAUGHN PERRET,
CHRIS YOUNT, TROUT POINT LODGE
LIMITED, NOVA SCOTIA ENTERPRISES, LLC

DEFENDANTS

MOTION TO DISMISS
DEFENDANT DANIEL G. ABEL

COMES NOW Defendant Daniel G. Abel, appearing pro se who moves the Honorable Court to dismiss the complaint removed hereto under FRCP Rule 12, filed by complainant Douglas K. Handshoe against him. The state court where Handshoe originally filed suit lacks subject matter jurisdiction, lacks personal jurisdiction, cannot be vested with venue. Plaintiff Handshoe has no right of action and fails to state a claim upon which relief can be granted.

Defendant Daniel G. Abel moves this Honorable Court to dismiss the Complaint with prejudice and reserves his right to request costs, fees, and sanctions as are available under Mississippi law and Rule 11 of the Federal and Local rules of this United States District Court.

RESPECTFULLY SUBMITTED,

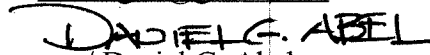
DANIEL ABEL
s/ Daniel G. Abel
LSB No. 8348

ORIGINAL

CERTIFICATE OF SERVICE

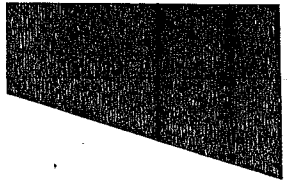
On 13 June 2013, I served a true copy of the Motion to Dismiss to:

Douglas K. Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL AND EMAIL:
earning04@gmail.com


s/ Daniel G. Abel

Daniel G. Abel
2421 Clearview Parkway
Legal Department – Suite 106
Metairie, LA 70001
Telephone: (504) 208.9610
Facsimile: (888) 577.8815
Email: danielpatrickegan@gmail.com

TO: DAVID C. ABEL
2421 CLEAVEDON PKWY
SUITE 106
METairie, LA 70002



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SOUTHERN DISTRICT OF MISS.

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DAN M. RUSSELL, JR. COURTHOUSE

2012 15th STREET - SUITE 403

GULFPORT, MS. 39501